

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL JENKINS, et al.

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Plaintiffs,

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**Civil Action No.
3:23-cv-374-DPJ-ASH**

v.

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RANKIN COUNTY, MISSISSIPPI, et al.,

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Defendants.

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**PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES FROM DEFENDANT
RANKIN COUNTY**

Come now, the Plaintiffs, by and through counsel, and pursuant to F.C.R.P. Rule 37 and hereby moves to compel discovery responses to Plaintiffs' Request for Documents #6, #15, #17, #23, #27, #29, and #30. Plaintiffs' Motion to Compel is related to Plaintiffs' request for production of IA investigation notes, IA findings, Garrity statements, body-worn camera footage, taser logs and personnel files. Plaintiffs shall file a separate Motion to Extend Discovery Deadline for the limited purposes of filing their Motion to Compel under separate cover.

In support of this motion, Plaintiffs submit the following exhibits:

- a. March 21, 2025 letter from Plaintiffs to defense counsel [ex. 1]
- b, March 26, 2025 email from defense counsel to Plaintiffs [ex. 2]
- c, Defendants answers to Plaintiffs' Req. for Production of Documents [ex.3]
- d. Def. supp. response to Plaintiff's Request for Prod of Documents [ex. 4]

Therefore, Plaintiffs move the court to compel production of document responses #6, # 15, 1s7, #23, #27, #28, and #30 from Defendant Rankin County

CERTIFICATION OF COUNSEL

Prior to filing this motion, Plaintiffs' counsel requested the documents sought to be compelled of Defendant Bailey through his counsel via conference call on 2/21/2025; Judicial conference call on 3/20/25; email on Friday 3/ 21, 2025 and emails on 3/26/ 2025. Defense counsel informed Plaintiffs' that he would not supplement RPD responses 23, 27, 29, 30, invoking Local Rule 7(b)(2)(C).

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/
MALIK SHABAZZ, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of March 2025 I electronically transmitted this Motion to Compel to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.